

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

JESSYCA REDLER and	)	
BRYAN REDLER,	)	
	)	CIVIL NO.: 3:14-CV-017
Plaintiffs,	)	
	)	
	)	JURY TRIAL DEMANDED
MARRIOTT OWNERSHIP RESORTS	)	
(ST. THOMAS), INC. d/b/a	)	
MARRIOTT FRENCHMAN'S COVE	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT'S EMERGENCY MOTION FOR HEARING ON DEFENDANT'S  
MOTION FOR REASONABLE EXPERT FEES FOR DEPOSITIONS OF  
TREATING/EXPERT DOCTORS**

Defendant, MARRIOTT OWNERSHIP RESORTS (ST. THOMAS), INC. d/b/a/ MARRIOTT FRENCHMAN'S COVE ("MARRIOTT"), by and through undersigned counsel, hereby requests an Emergency *Telephonic* Hearing on Marriott's Motion for Reasonable Expert Fees For Depositions of Treating/Expert Doctors and in support thereof states:

1. This is an action by Plaintiffs. Jessyca Redler and Bryan Redler ("Plaintiffs") for personal injuries allegedly sustained while vacationing at the Marriott on or about April 15, 2012.

2. On March 27, 2015, Plaintiffs' produced a Statement of fees for Dr. Abraham. [DE #135, Ex. A].

3. Due to the unreasonable fee amount requested, on April 3, 2015, the undersigned sent Attorney Karin Bentz correspondence requesting she provide reasonable fees for Plaintiffs' experts. *See Exhibit A.* Plaintiffs' attorney did not.

4. As such, on April 10, 2015, the undersigned filed its Motion to Set Reasonable Fees for Depositions of Treating/Expert Doctors. *See Exhibit B.*

5. Plaintiffs are requesting pre-payment of experts' fees prior to deposition. Plaintiff's expert Dr. Abraham's deposition is scheduled for April 23, 2015 at 11am in Boca Raton, Florida and other depositions are also scheduled for May 2015.

6. Accordingly, the undersigned respectfully requests this Honorable Court schedule an emergency telephonic hearing on Defendant's Motion to Set Reasonable Fees for Depositions of Treating/Expert Doctors.

7. The undersigned also respectfully requests that the Court grant her permission to appear telephonically for the hearing.

WHEREFORE, MARRIOTT respectfully requests that the Court grant Defendant's Emergency Motion for Hearing on Marriott's Motion to Set Reasonable Fees for Depositions of Treating/Expert Doctors, *schedule a hearing prior to April 22, 2015* and grant the undersigned permission to appear telephonically and such other and further relief the Court deems just and proper.

*[Signature of Counsel on following page]*

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Respectfully submitted,

/s/Schuyler A. Smith  
Jennifer Quildon Miller, Esq.  
V.I. Bar No. 1109  
Schuyler A. Smith, Esq.  
V.I. Bar No. 1271  
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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via e-mail and/or U.S. Mail on April 15, 2015, to: Pamela Lynn Colon, Esq., 2155 King Cross Street, Suite 3, St. Croix, U.S. Virgin Islands 00820-4842 and Andrew C. Simpson, Esq, 2191 Church Street, Suite 5, Christiansted, VI 00820.

/s/Schuyler A. Smith  
Schuyler A. Smith, Esq.